

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

J.Y.C.C., et al.,)	
)	
Plaintiffs,)	
)	
v.)	
)	No. 4:15-CV-1704-RWS
Doe Run Resources Corporation, et al.,)	(Consolidated)
)	
Defendants.)	

**PLAINTIFFS' REPORT REGARDING PLAINTIFFS' PRODUCTION OF NOTARIZED
PROFILE SHEETS**

Pursuant to this Court's July 19, 2022 Order (Dkt No. 678) ("July 19 Order"), COME NOW Plaintiffs, by and through the undersigned counsel, and respectfully submit a report advising the Court of the following:

On July 19, 2022, this Court ordered all Plaintiffs who had not yet produced notarized profile sheets to Defendants to do so by October 31, 2022. (Dkt No. 678 at 2). On October 31, 2022, Plaintiffs produced 834 notarized profile signature pages (not the full profile sheets) 128 of which Defendants contend are duplicates. On November 11, 2022, Plaintiffs produced 15 additional notarized profile signature pages as well as a load file identifying the Plaintiffs included in the production.

Plaintiffs object, absent a motion, to the dismissal of the 834 plaintiffs identified in Defendants' Status Report (Dkt. No. 713). This Court's Order does not contemplate an automatic dismissal with prejudice of plaintiffs who failed to provide notarized and signed fact sheets by the October 31 deadline. *See* July 19, 2022 Order (Dkt. No. 673). As outlined in Plaintiffs' prior motions for protective order, there has been a concerted effort to discourage participation by

existing plaintiffs in these lawsuits through, among other things, shaming, intimidation, harassment, and dissemination of disinformation in the La Oroya. For these and other reasons, Plaintiffs respectfully submit that any request for dismissals should be made by motion pursuant to the Federal Rules and Plaintiffs be given an opportunity to respond in full.

Respectfully submitted, this 14th day of November, 2022.

RODRIGUEZ TRAMONT + NUÑEZ, P.A.

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CERTIFICATE OF SERVICE

I hereby certify that on November 14, 2022, the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing upon counsel of record.

/s/ Patrick J. Lanciotti
Patrick J. Lanciotti